

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE

In Re:)
) Case No. 18-12246
Virginia Spencer)
Debtor(s).)

TRUSTEE'S APPLICATION FOR AUTHORITY AND APPROVAL TO
EMPLOY TODD CLOUSER, A MEMBER OF REMAX REALTY SOURCE,
AND APPROVE LISTING AGREEMENT FOR SALE OF REAL PROPERTY

Michael Tabor, the Chapter 7 Trustee herein, pursuant to 11 U.S.C. §327, respectfully states:

1. The Applicant is the duly qualified and acting Chapter 7 Trustee of the bankruptcy estate of Virginia Spencer .
2. Todd Clouser, a member of ReMax Realty Source, (jointly referred to hereafter as "Local Listing Broker") has the expertise and knowledge to assist the Chapter 7 trustee with the listing and sale of real property located at 627 KELLER ST BOLIVAR, TN 38008, legally described as follows:

Parcel Number: 035070I G 00400

Census Tract: 470699503.001071

Carrier Route: C001

Abbreviated Description: DIST:01 JACKSON KELLER H 3PT2 MAP REF:070I

hereinafter referred to as the "Real Property".

3. The Debtors have not declared the Real Property as exempt.

4. The Chapter 7 Trustee desires to employ Local Listing Broker to provide professional services on behalf of this bankruptcy estate for the listing and sale of the Real Property identified hereinabove, in which the above-named Debtor holds an interest. The Local Listing Broker is requesting a commission of two percent (2%) of the gross sale proceeds. All fees and expenses will be presented to the Court for approval prior to payment. The buyer's agent, if one is involved in the sale, will be paid 2% of the gross sale proceeds.
5. Attached hereto as Exhibit "A" is the duly executed and verified statement on behalf of the Local Listing Broker that their employees and members are disinterested persons, as the term is used in the Bankruptcy Code, do not hold an interest adverse to the bankruptcy estate, is not aware of any connection with the Debtor, creditors, any other party in interest, their respective attorneys or accountants, the United States Trustee or any person employed in the Office of the United States Trustee and understand there is a continuing duty to disclose any such adverse interest.
6. Notice of this Application is being served upon the Office of the United States Trustee, Debtor's counsel, Debtor and all parties of interest in this matter.
7. Attached hereto as Exhibit "B" is a copy of the Listing Agreement and the Chapter 7 Trustee requests that the Court approve this Agreement, which the Chapter 7 Trustee has executed on behalf of this bankruptcy estate.
8. BK Global Real Estate Services ("BK Global") has been retained by the Chapter 7 Trustee and BK Global has agreed to fully cooperate with Local Listing Broker, and to be paid 2% of the gross sale proceeds.
9. Mr. Cooper claims a mortgage interest in and to the Real Property known as 627 KELLER ST BOLIVAR, TN 38008 and has consented to the sale of the Real Property subject to their security

interest.

WHEREFORE, the Trustee prays the Court enter an Order approving and authorizing the employment of Todd Clouser, a member of ReMax Realty Source, to perform professional services on behalf of this bankruptcy estate, for the listing and sale of the Real Property known as 627 KELLER ST BOLIVAR, TN 38008, in which the Debtor holds an ownership interest; and for such other and further relief as the Court deems necessary.

DATED this the 22nd day of January, 2019.

/s/ Michael T. Tabor

*MICHAEL T. TABOR, #4736

CHAPTER 7 TRUSTEE

P.O. BOX 2877

JACKSON, TN 38302-2877

(731)424-3074

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing has been served on the following electronically or by mailing a copy of the same postage pre-paid.

This the 22nd day of January, 2019.

/s/ Michael T. Tabor

MICHAEL T. TABOR

Postage Pre-Paid

Debtor

All Entities on Matrix

Electronically

Attorney for Debtor

U.S. Trustee